

**PSJ4 SOL Opp Exh 53**

|    |                                     |                         |
|----|-------------------------------------|-------------------------|
| 1  | IN THE UNITED STATES DISTRICT COURT |                         |
|    | FOR THE NORTHERN DISTRICT OF OHIO   |                         |
| 2  | EASTERN DIVISION                    |                         |
| 3  | IN RE NATIONAL PRESCRIPTION         | MDL No. 2804            |
| 4  | OPIATE LITIGATION                   | Case No. 17-MD-2804     |
| 5  | This Document Relates to:           | Judge Dan Aaron Polster |
| 6  | The County of Summit, Ohio,         |                         |
|    | et al., v.                          |                         |
| 7  | Purdue Pharma L.P., et al.          |                         |
|    | Case No. 17-op-45004                |                         |
| 8  |                                     |                         |
|    | The County of Cuyahoga v.           |                         |
| 9  | Purdue Pharma L.P., et al.          |                         |
|    | Case No. 18-op-45090                |                         |
| 10 |                                     |                         |
|    | City of Cleveland, Ohio v.          |                         |
| 11 | Purdue Pharma L.P., et al.          |                         |
|    | Case No. 18-op-45132                |                         |

TUESDAY, JANUARY 22, 2019

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16 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
CONFIDENTIALITY REVIEW

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Videotaped deposition of EMILY HALL, held at  
19       Foley & Lardner LLP, One Biscayne Tower, 2  
      Biscayne Boulevard, Suite 1900, Miami, Florida,  
20       commencing at 9:15 a.m., on the above date,  
      before Kelly J. Lawton, Registered Professional  
21       Reporter, Licensed Court Reporter, Certified  
      Court Reporter.

22

23 GOLKOW LITIGATION SERVICES  
24 877.370.3377 ph | 917.591.5672 fax  
deps@golkow.com

1           A.     So a limit is what a customer is granted,  
2     right? This is your limit. You can't go over this  
3     limit when we talked about 1,000-unit family limit.

4                 This is an algorithm. So if they place an  
5     order within that 1,000 family unit, let's say one  
6     piece of something, and it gets flagged based on this  
7     algorithm, any of these steps, that is now considered  
8     a suspicious order in the bucket. Bucket.

9           Q.     And then that bucket would be referred to the  
10    DEA? If a customer's order got put in the bucket,  
11    that bucket is being sent to the DEA, or is it being  
12    sent somewhere else?

13          A.     No. This is an internal bucket to review  
14    suspicious orders.

15          Q.     So a customer would have to order more than  
16    eight times its average in order for that order to be  
17    held?

18          A.     No. So you take the whole -- the whole  
19    line -- you take the DEA quantity for that month. So  
20    everything they did for that month, times it by the  
21    six-month -- I mean, excuse me, divide it by the  
22    six-month time frame, and then you multiply that by  
23    the multiplier.

24          Q.     So would it be possible for -- so if

1       somebody -- if somebody ordered past their limit --  
2       let's say their limit is 5,000 units. If a customer  
3       tried to order 6,000 units, is that a suspicious  
4       order?

5           A.    A customer cannot order past their limit.

6           Q.    Okay. And if they attempt to order past  
7       their limit, what happens then?

8           A.    They can't.

9           Q.    Does that ever get reported in any system?

10          A.    No.

11          Q.    Does that order ever get referred to the DEA  
12       as suspicious?

13          A.    Not that I'm aware of.

14          Q.    What is the purpose of the control limit?

15          A.    It's a comfort level for us to give them a  
16       specific quantity for a family based on when we set  
17       them up and we did the review on them.

18          Q.    Is the control limit mechanism in which Anda  
19       can avoid shipping suspicious orders?

20                MS. KOSKI: Object to form.

21                THE WITNESS: Can you please clarify?

22       BY MR. STOLTZ:

23          Q.    Is the control limit purpose to avoid  
24       shipping suspicious orders to customers?